

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
NATASHA SEVERIN, *et al.*,

Plaintiffs,

v.

No. 10 Civ. 9696 (DLC)

PROJECT OHR, *et al.*,

Defendants.

-----X

SUPPLEMENTAL DECLARATION OF JENNIFER SMITH
IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

I, Jennifer Smith , declare under penalty of perjury:

1. I am associated with the firm Beranbaum Menken LLP, attorneys for Plaintiffs, Natasha Severin *et al.*, in the above captioned action. I submit this Declaration in support of Plaintiffs' Motion for Class Certification.

3. Attached hereto as Exhibit 4 is a copy of Project OHR's Personnel Policies and Procedures.

4. Attached hereto as Exhibit 19 are copies of time and attendance records for Plaintiff Natasha Severin for the weeks ending March 31, 2006 March 24, 2006.

5. Attached hereto as Exhibit 36 is a copy of Plaintiffs' Notice of Deposition pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure.

6. Attached hereto as Exhibit 37 is a redacted copy of a Quarterly Report.

7. Attached hereto as Exhibit 38 is a redacted copy of a payroll record for Galina Cotova for the weeks ending January 28, 2005 and February 4, 2005.

8. Attached hereto as Exhibit 39 are redacted copies of time and attendance records for Galina Cotova for the weeks ending January 28, 2005 and February 4, 2005.

9. Attached hereto as Exhibit 40 are excerpts from the February 29, 2012 deposition of Nathan Blau.

10. Attached hereto as Exhibit 41 are excerpts from the September 26, 2011 deposition of Project OHR's Executive Director, D'vorah Kohn.

11. Attached hereto as Exhibit 42 are excerpts from the September 20, 2011 deposition of Plaintiff Natasha Severin.

12. Attached hereto as Exhibit 43 are excerpts from the September 28, 2011 deposition of Susan Schaefer, Personnel Manager at Project OHR.

13. Attached hereto as Exhibit 44 are excerpts from the September 8, 2011 deposition of Plaintiff Galina Cotova.

14. Attached hereto as Exhibit 45 are excerpts from the September 23, 2011 deposition of Anna Reydman, Director of Patient Services at Project OHR.

15. Attached hereto as Exhibit 46 are redacted excerpts from a sample payroll run.

16. Attached hereto as Exhibit 47 is a chart I prepared that summarizes wage rates paid to home attendants between the dates of January 2004 and the present. The information in this chart is based the wage scale in the Collective Bargaining Agreement between Defendant Project OHR and 1191/SEIU New York's Health and Human Services Union and applicable Addenda thereto.

Dated: New York, New York
April 2, 2012

Respectfully submitted,

BERANBAUM MENKEN LLP
Attorneys for Plaintiffs

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